Draft Salmon Habitat Plan: Tracking Form for Comments

Question: Do you have questions or comments about the **SCIENCE** underlying a project, program, or policy?

Green/Duwamish and Central Puget Sound Watershed (WRIA 9)
March 10 – April 25, 2005

Please use a separate row for each comment.

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	Grotheer, Wayne, Port of Seattle, 4/4/05	2-16		The plan often states hypothesis and conjecture as highly supported fact. A persistent example is the statement of a rearing bottleneck in the transition zone. There have been some indications of such a bottleneck but it is has not been demonstrated as yet. Further, there is good evidence that a substantial Chinook population would persistent in the system no matter what the conditions are in the transition zone. It is not incorrect to state that this area may be important, but it is incorrect to state the conclusion as strongly and definitively as has been done throughout the document.			
	Barrie, Al, email 3/29/05	2-17		Adaptive Management - Third Strategy This paragraph fails to identify 'Base Line Data' as a significant key to Adaptive Management. Monitoring is crucial to Metrics, but without Baseline 'Starting Points' you lack a point of reference to	substantive		

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				measure against.			
	Grotheer, Wayne, Port of Seattle, 4/4/05	2-18		The population targets should be clearly expressed as adult recruits (i.e., total adult population prior to harvest). The targets are expressed in a manner to suggest they are adults on the spawning grounds.			
	Grotheer, Wayne, Port of Seattle, 4/4/05	2-22		See comment re page 2-22 above re: failure to consider impact of harvest and hatcheries on salmon recovery. There is a huge body of science associated with that which is being ignored here.			
	Barrie, Al, email 3/29/05	2-23		Monitoring and Adaptive Management - For those not schooled in Adaptive Management processses, the terminology 'Assessment' does not emphasize 'Baseline Data Gathering' for the monitoring phase.	substantive		
	Grotheer, Wayne, Port of Seattle, 4/4/05	3-6		Section 3-4 should avoid unsubstantiated technical conclusions, instead appropriate conclusions that are supported by previous technical documents should be should be placed in Section 3-6. Page 3-6 contains the conclusion that juvenile salmonids are subjected to predators as they navigate around over-water structures in the marine and estuarine environment. This potential effect has been studied and best available science indicates there is no such effect. The plan should avoid reporting effects that are essentially "urban legends".			

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	Grotheer, Wayne, Port of Seattle, 4/4/05	3-9	Table 3-1	The table should be labeled in such a way as to state that the uses and acreages do not correspond to the area of the drainage that lies upstream of the specific location. For example, while the Middle Green has 50% of its area in residential land uses, the overall area upstream of the Middle Green that is in commercial forest or other low intensity use is quite high. This changes the perspective dramatically and gives a truer picture of the upstream land uses that effect instream habitat in a specific subwatershed.			
	Grotheer, Wayne, Port of Seattle, 4/4/05	3-12, 3-13		The section on harvest focuses almost entirely on the effect on spawner abundance via catch. In a document with hundreds of pages addressing habitat it would be reasonable to expand the discussion of impacts of harvest to include the biological effects of harvest. Subjects such as nutrient transfer, age and size at spawning, and the effects of harvest on life history diversity should be addressed in as rigorous a manner as is habitat. The point is that the cessation or reduction of harvest that has been seen in the last decade has not likely offset the biological and habitat effects of past overharvest.			
	Grotheer, Wayne, Port	3-14, 3-15	Table[s] 3-2	These tables are so general as to be meaningless. If such a presentation is			

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	of Seattle, 4/4/05		3-3	made at this point in the report it should be on the key elements related to habitat decline. Further, several points are very speculative specifically there is little or no evidence that introduced species have had any detrimental effects on salmonids in estuarine or marine environments. Similarly, the role of riparian vegetation in the marine and estuarine environments is vastly overstated. The plan suffers from a lack of focus on the most important aspects affecting salmonid habitat, while losing itself in minutia. This is a result of an overly theoretical application of the ecosystem approach.			
	Barrie, Al, email 3/29/05	3-16/17		Factors of Decline - Each subwatershed FOD identifies physical issues and ignores the bio-mass losses caused by diminished habitat health. Issues like riparian vegetation, large woody debris, marshes, etc., are discussed without the link to the contributions these features make to the ecosystem. This Cause & effect relationship needs to be shown!	substantive		
	Grotheer, Wayne, Port of Seattle, 4/4/05	4-1		The Port has commented at length previously on the use of the term "necessary future conditions" during its review of the Strategic Assessment, which is cited in Section 4.1 as the primary scientific foundation for the plan. We continue to urge that the word			

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				necessary be modified to desirable or ideal, as necessary by definition implies a certainty that does not exist. The Strategic Assessment does not provide adequate technical analysis to draw conclusions as to what is necessary in WRIA 9 to reach a viable salmonid population. The plan needs to be clear on what it is actually presenting or it discredits itself. Most of the habitat direction that is indicated in the plan is appropriate but is does not define what is necessary. We have attached the comments that we provided earlier regarding the Strategic Assessment (January 19. 2005 from Glenn Grette to Lorin Reinelt).			
	Grotheer, Wayne, Port of Seattle, 4/4/05	4-12		Future conditions for upper Green are likely appropriate due to the ability of this portion of the stream to respond to natural processes.			
	Grotheer, Wayne, Port of Seattle, 4/4/05	4-13		Future conditions for Middle Green are generally appropriate but specific quantitative goals (e.g., 65%) are not supported adequately. Overall, improvement and protection of Middle Green spawning and rearing habitats is a key for the survival of Chinook in the system. The plan tends to blunt the importance of this reach and muddle its importance. If habitat is degraded substantially in this reach the Green will			

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				not support chinook. Similarly, habitat improvement in this reach is likely to yield measurable results.			
	Grotheer, Wayne, Port of Seattle, 4/4/05	4-20		The stated future conditions are likely desirable but are not necessarily achievable in this portion of the river. The lower river is the first part of the system where existing constraints seriously limit opportunities. This is particularly true for the lower portion of the reach. The target levels (e.g., 45%) are not supported by adequate analysis. Overall, moving habitat conditions in the direction indicated would improve habitat in the system, but it is not clear that such improvements are necessary for the system, nor whether they will yield any returns of Chinook.			
	Grotheer, Wayne, Port of Seattle, 4/4/05	4-24		Future conditions for the estuary are generally unsupported. Moving in the direction indicated would be expected to result in habitat improvement in the system. However, based on the investment in this area habitat actions will come at great cost in dollars and in lost economic opportunity. For these reasons, it is important that such conditions not be represented as "necessary" as they cannot be supported as such. For example, the specific target of 30 percent of historic habitat cannot be supported technically as			

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				necessary. Further, there is no data that supports the conclusion that overwater structures must be reduced in the estuary to have a viable Chinook population. The role of riparian vegetation is overstated for this habitat type. The Port will be submitting a separate review of the primary source document (Brennan et al. 2004) simultaneously with the final comments on the plan.			
	Grotheer, Wayne, Port of Seattle, 4/4/05	4-26		The information from Brennan et al 2004, should be struck from the plan as the data in Brennan et al. does not support such statements. The Port has submitted under separate cover a critique of that report. Toft et al. (2004) should not be cited in reference to juvenile salmonid behavior near overwater structures. That study contains one quick reference to an observation rather than any specific study of behavior near structures. There are other focused studies of juvenile salmonid behavior near structures that are much more useful. Toft et al. findings relative to habitat slope and substrate are appropriate to cite.			
	Grotheer, Wayne, Port of Seattle, 4/4/05	4-27 4-28		Future conditions for the nearshore are generally unsupported. Moving in the direction indicated would be expected to result in habitat improvement in the			

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				system. However, based on the investment in this area habitat actions will come at great cost in dollars and in lost economic opportunity. For these reasons, it is important that such conditions not be represented as "necessary" as they cannot be supported as such. Further, there is no data that supports the conclusion that overwater structures must be reduced in the nearshore to have a viable Chinook population. The role of riparian vegetation is overstated for this habitat type. The Port will be submitting a separate review of the primary source document (Brennan et al. 2004) simultaneously with the final comments on the plan.			
	Grotheer, Wayne, Port of Seattle, 4/4/05	4-31		Many watershed wide conservation hypotheses are not applicable in specific subwatersheds. There should be no common list for all sub watersheds due to the differences.			
	Grotheer, Wayne, Port of Seattle, 4/4/05	4-31 4-32		The statements about bottlenecks and priorities of habitats are muddled. The statements in the plan reflect a political interest in ensuring that all jurisdictions have a habitat focus. However, it is important the plan identify priorities even though we recognize that activity will occur in all subwatersheds.			
	Nix, Aaron,	4-32		In general, much focus has been geared			

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	City of Auburn, 4/1/05			towards the Duwamish and Nearshore habitats (Places with potentially the greatest need?). It's still unclear what impacts this will have on utilities, City's, businesses, etc. further up the watershed. Will these entities be asked to help compensate for past land practices and how will the plan address this equity discrepancy?			
	Grotheer, Wayne, Port of Seattle, 4/4/05	4-35		Abundance and diversity goals are broad and not strongly supported by technical analysis. However, the goals have adequate caveats to be useful for system planning given the current level of knowledge. In general, the "necessary population conditions" for abundance and productivity presents an orderly basis for looking at near-term goals in the system. The discussion would be much stronger if the relationship of the hatchery fish to the wild spawners were clearly stated. Specifically, it is our understanding that the co-managers are treating the hatchery program as an integrated population rather than a segregated population. Therefore, some of the statements about acceptable levels of HOR spawners in the system are likely not appropriate under an integrated program. For example, on page 7-4 it is stated that the co-managers are managing the population as integrated			

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				and that HOR can be up to 30 % of the spawning population.			
	Grotheer, Wayne, Port of Seattle, 4/4/05	4-36		Spatial goals for the system are appropriate.			
	Grotheer, Wayne, Port of Seattle, 4/4/05	4-37		Diversity goals for the system are appropriate.			
	Grotheer, Wayne, Port of Seattle, 4/4/05	5-7	Table 5-1	The table provides a good summary of the key population objectives in the system. The information in this table should be brought forward more clearly in the process of developing habitat priorities in the system. This Table presents what we likely need to accomplish to achieve VSP.			
	Grotheer, Wayne, Port of Seattle, 4/4/05	5-8		The clear focus provided by Table 5-1 is lost under the first paragraph of "Implications for viability" . This sections wanders back into the vaguely presented ecosystem view that cannot clearly state that some habitats are more important than others for salmonid conservation. The focus on the question of whether transition zone is limiting is appropriate but may be distracting. The second paragraph of the section focuses appropriately on the importance of the Middle Green to this population. The focus developed in this paragraph should			

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				be carried through the rest of the document.			
	Grotheer, Wayne, Port of Seattle, 4/4/05	5-11 5-12		The section appropriately points out the importance of the Middle Green. However, the focus is likely too strong on re-establishment of natural processes given the constraints imposed by the flood control dam. We need to be realistic that this reach (in contrast to the upper Green) is likely to need more rehabilitation and substitution than the more natural system upstream. Therefore, because of its importance to the population and the likely need for active intervention above and beyond process re-establishment it is important to continue to focus on the importance of this area as a focus for active habitat actions, while looking for opportunity to reintroduce natural processes.			
	Grotheer, Wayne, Port of Seattle, 4/4/05	5-13		The section appropriately identifies rehabilitation and substitution as important in this subwatershed. However, it would be helpful to bring forward specific types of actions as cost-effective in this zone. The greatest near-term benefits could probably realized by increasing cover and structure on edge habitat. This recommendation is based on the Science Panel process wherein it was seen that many of the more aggressive			

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				activities (excavation of off-channel area etc) had questionable potential for successfully providing habitat. Similarly, some low cost actions (e.g., riparian planting) had limited benefits because the vegetation would need to be placed so far from the river. The Science Panel process should be used to inform and prioritize the type of actions presented in this section because that process actually looked at a high number of the opportunities that are presented theoretically in this document.			
	Grotheer, Wayne, Port of Seattle, 4/4/05	5-14		See comment above re page 4-24 regarding no technical validity of 30 percent target for capacity.			
	Grotheer, Wayne, Port of Seattle, 4/4/05	5-15		Rehabilitation of riparian vegetation in the developed portions of the nearshore habitat is given inappropriately disproportionate weight. The treatment of the developed portion of the nearshore should be treated similarly to the discussion for the estuary where the presence of existing infrastructure is recognized.			
	Grotheer, Wayne, Port of Seattle, 4/4/05	5-17		The last paragraph of the section "Habitat Management Strategies and Viability" presents a focus on the Upper Green, Middle Green, and Transition Area that should be carried forward clearly.			

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	Taylor, Bob, Covington Water District, 4/1/05						
	Grotheer, Wayne, Port of Seattle, 4/4/05	6-2		The focus provided on page 5-17 is lost on 6-2. The marine nearshore is brought forward as a key habitat when the case has not been made previously. The statement about the estuary bottleneck is likely too strong, but it is appropriate to keep the concept of this potential bottleneck as a focus with upper and Middle Green.			
	Hickey, Paul, TPU, 4/1/05	6-4	Table 6-1	I don't recall the Technical Committee discussing the contents of Table 6-1. The information in the table should be discussed by the Technical Committee with respect to its applicability to the Green River. The information source is not listed in the Reference section.			
	Grotheer, Wayne, Port of Seattle, 4/4/05	6-4		Table 6-1 The table is inappropriate for application to all WRIA 9 streams. The table makes no allowances for the different types of streams within the WRIA.			
	Grotheer, Wayne, Port of Seattle, 4/4/05	6-5		"The WRIA 9 Strategic Assessment, Section 7, establishes the necessary future habitat and salmon population conditions to support a viable population of Chinook salmon." The cited report has not			

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				"established" these points. This statement is the basis for the sophistry to dictate the policies on page 6-5 and elsewhere.			
	Grotheer, Wayne, Port of Seattle, 4/4/05	6-5	LU3	As noted in our comments above re the projects, programs & policies, this is not appropriate in areas served by stormwater drainage systems. The only place where these recommendations are backed by any scientific foundation is small streams. There is insufficient evidence to show that such actions are necessary for salmon recovery anyplace else. Therefore, it should NOT be a WRIA-wide policy that would apply in the lower Duwamish and Marine Nearshore areas.			
	Grotheer, Wayne, Port of Seattle, 4/4/05	6-5	LU4	As noted in our comments above re the projects, programs & policies, this is not applicable to developed jurisdictions. The only place where these recommendations are backed by any scientific foundation is small streams. There is insufficient evidence to show that such actions are necessary for salmon recovery anyplace else. Therefore, it should NOT be a WRIA-wide policy that would apply in the lower Duwamish and Marine Nearshore areas.			
	Nix, Aaron, City of Auburn, 4/1/05	6-59		It is presumed, with very little scientific backing, that groundwater inflow from the historical White River channel in Auburn is a major contributor to Green			

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				River surface elevations. Obviously, more research is needed in order to verify the validity of this statement. We must be able to balance the needs of a growing population as mandated by GMA and fish.			
	Vashon/ Maury Island resident, 3/31/05 Vashon public meeting	6-92	NSP-4: Failing Septic	*How much of a tie is there between failing septic systems around Quartermaster Harbor and the health of Chinook salmon.*		Staff responded in to question at the time	
	Grotheer, Wayne, Port of Seattle, 4/4/05	8-10		Table 8-1 The table presents local government options for implementing the plan option 3 includes local jurisdiction incorporating the plan as Best Available Science. In addition to our other concerns with the plan, it is too laden with policy to be acceptable as BAS.			
	Taylor, Bob, Covington Water District, 4/1/05	N/A	N/A	How will WRIA 9 assure that the most up-to-date and accepted scientific methods and data will be utilized?			
	Public meeting comment, 3/22/05			*What is shallow water habitat?*	Substantive		Answer provided to questioner.
	Tidball, Bob,			*Show the degree of effect of each project.*			

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	public meeting comment, 3/23/05			*Just mentioning VSP parameters is not enough.*			
	Public meeting comment, 3/23/05			*If we do every action included in the Plan, can you guarantee salmon recovery? How does Plan take into account that some factors are out of our control? Will Steering Committee look at the big picture?*			
	Public meeting comment, 3/23/05			*Do instream recreational activities such as inner tubing threaten salmon habitat?*	Substantive		
	Public meeting comment, 3/23/05			*How are wild and hatchery fish managed within the same watershed?*	Substantive		
	Tibeau, Duane, mailed comments, received 3/30/05			Science is helpful but it is not the answer.	editorial		
	Tibeau, Duane, mailed comments, received 3/30/05			Reclaim and restore every last inch of the required habitat area and the salmon will restore themselves.	editorial		
	Tom Dean,			Under science, I would provide a program	substantive		

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	Vashon-Maury Island Land Trust, 4/1/05 email			for volunteers to assist with sampling for beach-spawn of forage fish.			
	Kalhorn, Susie, VMI Comm. Council, 4/1/05		#s of Spawners	How did we come up with 1000 NOR spawners as a goal? That seems low to me.			
	Kalhorn, Susie, VMI Comm. Council, 4/1/05		Upper watershed	I need to understand the pros and cons of the trap and haul methods of moving fish around dams. Is there not a fish ladder being built at HH? So is the trap and haul proposal for going up or down stream? Why would we consider introducing hatchery fish to the upper watershed?			